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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JENNAFER AYCOCK,

Plaintiff,

vs.

AMERICAN EXPRESS NATIONAL
BANK; and EXPERIAN
INFORMATION SOLUTIONS, INC.,

Defendants.

Case No. 2:23-cv-00292-CDS-EJY

**AMENDED JOINT STIPULATION
TO EXTEND DEADLINE FOR
AMERICAN EXPRESS TO
RESPOND TO PLAINTIFF'S
MOTION TO COMPEL
DISCOVERY RESPONSES AND
SUPPLEMENTAL DISCLOSURES**

(FOURTH REQUEST)

Plaintiff Jennafer Aycock ("Plaintiff") and defendant American Express
National Bank ("American Express") (collectively, the "Parties"), through their

1 respective attorneys of record, hereby submit their Joint Stipulation to extend time
2 to respond to Plaintiff's Motion to Compel Discovery Responses and Supplemental
3 Disclosures (ECF No. 52) (the "Motion"), and in support thereof state as follows:

4 1. On October 17, 2024, Plaintiff filed the Motion.

5 2. On October 31, 2024, American Express filed a Stipulation and
6 Order extending American Express' deadline to respond to the Motion by eleven
7 (11) days and Plaintiff's reply by seven (7) days. (ECF No. 53)

8 3. On November 8, 2024, American Express filed a second
9 Stipulation and Order further extending American Express' deadline to respond to
10 the Motion by seven (7) days and Plaintiff's reply by seven (7) days.

11 4. On November 15, 2024, American Express filed a third
12 Stipulation and Order further extending American Express' deadline to respond to
13 the Motion by seven (7) days and Plaintiff's reply by seven (7) days.

14 5. American Express's deadline to respond to the Motion is
15 currently November 25, 2024.

16 6. Plaintiff's reply in support of the Motion is currently due
17 December 9, 2024.

18 7. The Parties have agreed to extend the time for American
19 Express to respond to the Motion by nine (9) days, up to and including December
20 4, 2024, with a reciprocal extension of nine (9) days to the deadline for Plaintiff to
21 file a Reply Brief, up to and including December 18, 2024.

22 8. Good cause exists for granting this extension because the
23 parties require additional time to facilitate resolution of this matter conserve
24

judicial resources. The parties have engaged in extensive settlement negotiations and the matter appears close to resolution.

9. This extension is sought in good faith and not for the purpose of delay.

10. No party will be prejudiced by the relief sought herein.

THEREFORE, IT IS HEREBY STIPULATED that the time for American Express to respond to the Motion be extended by nine (9) days, up to and including December 4, 2024, with a reciprocal extension of nine (9) days to the deadline for Plaintiff to file a Reply Brief, up to and including December 18, 2024.

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: November 26, 2024